

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE PLACEMENT
CONSUMER PRIVACY LITIGATION

C.A. No. 1:12-MD-2358 (SLR)

This Document Relates to:

All Actions

DECLARATION OF EDWARD P. BOYLE

I, EDWARD P. BOYLE, hereby depose, swear and state:

1. I am a partner at Venable LLP. I have practiced law for over 15 years and am competent to testify on, and have personal knowledge regarding, the matters stated herein.

2. I represent Defendant Vibrant Media Inc. ("Vibrant") in the above-captioned matter. I respectfully submit this Declaration in support of Vibrant's Motion to Dismiss.

3. Attached hereto as **Exhibit A** is a true and correct copy of the *Wall Street Journal* article entitled "Google's iPhone Tracking: Web Giant, Others Bypassed Apple Browser Settings for Guarding Privacy" by Julia Angwin and Jennifer Valentino-Devries, which is cited in the Consolidated Class Action Complaint.

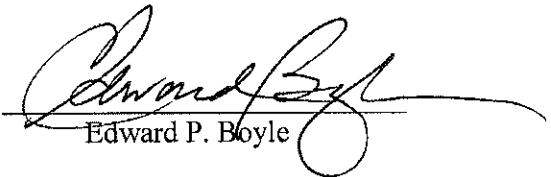
4. Attached hereto as **Exhibit B** is a true and correct copy of 18 U.S.C. § 1030 (2001), as downloaded from Westlaw.

5. Attached hereto as **Exhibit C** is a true and correct copy of 18 U.S.C. § 1030 (2002), as downloaded from Westlaw.

6. Attached hereto as **Exhibit D** is a true and correct copy of 18 U.S.C. § 1030 (1982 & Supp. V, 1983-1988), as downloaded from HeinOnline.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 1, 2013



Edward P. Boyle